# London Higher response to the Office for Students' consultation on the approach to publication of results of the National Student Survey

London Higher is the representative body for nearly 50 universities and higher education institutions across the capital, making it the largest membership body of its kind. London Higher represents the full diversity of the capital's vibrant higher education sector, from small, specialist conservatoires and research institutes to large, multi-faculty universities.

London Higher has been engaging with its members during the compilation of this submission and the below reflects a summary of their views.

**1. To what extent do you agree with our proposals to publish NSS results at a sector and provider level?**

London Higher members agree with these proposals and understand their benefits. However, it has also been suggested that it may be beneficial to review whether the amount of information provided is useful and used by prospective students, or whether it risks information overload. Following consultation, some members expressed that greater clarity would be appreciated for all audiences around where data is held and at which levels across the OfS and Discover Uni websites.

**2. Do you agree with our general approach to determining publication thresholds?**

Yes, this general approach is appropriate and sensible. However, greater clarity is needed regarding what the OfS determines to be a 'very high' response rate where results are suppressed due to unanimous or 'close to unanimous' responses. Clarity on what is meant by 'close to unanimous' would also be valued.

Once the OfS have confirmed their approach, clear definitions regarding thresholds – displayed prominently on websites – would be useful both for providers and for data users to interpret data.

**3. Are there any other considerations that we should take into account when determining publication thresholds, either now or in the future?**

There are currently no other considerations of note that should be taken into account when determining publication thresholds for now or in the future.

**4. Do you agree with our general approach to determining whether we aggregate across years?**

Yes, but comprehension would be supported by providing consistency and a clear methodology for aggregation. It is vital that where data has been aggregated, this information is clearly displayed to ensure correct interpretation of the data. This would help to mitigate issues regarding discrepancies between data on the Discover Uni website and data accessed through the NSS results portal.

**5. Are there any other considerations that we should take into account when determining whether to aggregate across years?**

No, there are currently no other considerations of note that should be taken into account when determining whether to aggregate across years.

**6. Please provide an explanation for your answers. If you consider that we should take a different approach, please explain how and the reason for your view.**

N/A

**7. Do you agree with proposals to use a positivity measure to present the NSS results? By 'positivity measure' we mean the proportion of respondents who answered the question using the first or second response option – that is, the more positive options.**

Yes, this is an improvement on the current approach. However, it is important that use of the positivity calculation is clearly indicated on the Discover Uni and OfS websites.

**8. Please provide an explanation for your answer. If you consider that we should take a different approach, please explain how and the reasons for your view.**

The positivity measure is easy to understand and is a good means by which to present the NSS results.

**9. Do you agree with our proposal to delay publication to autumn of question grouping until we can undertake statistical testing of their integrity?**

When consulted, London Higher's members expressed no clear consensus on the proposal to delay publication to question grouping.

Some members agree with the proposal insofar as it is preferable to delay publication groupings until the OfS can ensure their integrity through statistical testing of the NSS results, rather than publishing groupings initially and then potentially changing these later. Others have indicated that the delay between the publication of results and groups would be largely unhelpful, as it would likely result in a duplication of work. Organisations are likely to create their own groupings (which will be clearly indicated as unofficial) until the OfS publish official question groupings. As the OfS groupings are likely to be different to unofficial ones, organisations will then have to perform the same analysis and data dashboard production work again to match the OfS groupings when they are published. Some London Higher members have expressed concerns regarding the delay in relation to TEF data and the potential risk of league table compilers or institutions grouping questions themselves in the absence of OfS groupings.

It has been suggested by some that if the time between the release of results for individual questions and the results for question groupings is expected to be short, it would be preferable to delay the initial publication and instead publish all results at the same time. On the other hand, those who have indicated support for the delayed publication of question grouping – as preferable to publishing groupings only to later change them – have insisted that the delay to publication of question grouping be as short as possible to mitigate the aforementioned potential issues. In any instance, we reiterate that any decision and rationale surrounding this proposal should be clearly communicated to institutions.

**10. What will the impact of a delayed publication of question grouping have on users?**

It is probable that the impact of a delayed publication will be a duplication of work, as organisations are likely to create their own groupings (which will be clearly indicated as unofficial) until the OfS publishes official question groupings. As the OfS groupings are likely to be different to unofficial ones, organisations will then have to perform the same analysis and data dashboard production work again to match the OfS groupings. The delayed publication of question grouping would therefore likely create additional burden for institutions. However, some London Higher members have indicated that this would still be preferable to publishing groupings only to change them at a later date.

**11. Do you agree with the proposal to expand the current splits at sector level?**

Yes.

**12. Please provide an explanation for your answers. If you consider that we should take a different approach, please explain how and the reasons for your view.**

Expanded splits may be helpful, and greater consistency with those used by the DDB and the OfS in the TEF is welcomed. Furthermore, London Higher members welcome the proposal to consider apprenticeships as a separate mode of study, as this will allow greater access to apprenticeship data. Expanding these splits may also aid analysis by providing more granular data surrounding course types. Some members would also welcome further exploration of publishing NSS results split by personal characteristics, as this could be useful for identifying groups of students who may need additional support. However, some members have expressed that it may be useful to conduct user testing to see if this additional information is actually used by prospective students, or if it risks overloading data users with information.

**13. Do you agree with the proposal to expand the current splits at provider level?**

Yes.

**14. Please provide an explanation for your answers. If you consider that we should take a different approach, please explain how and the reasons for your view.**

Expanded splits may be helpful, and greater consistency with those used by the DDB and the OfS in the TEF is welcomed. However, it would again be useful for the OfS to conduct user testing to gain a greater understanding of whether this information is helpful and used, or potentially risks information overload.

**15. Do you agree with the factors used in our proposals for benchmarking?**

Yes. The proposals would be valuable for providing a greater level of benchmarking detail.

**16. Please provide an explanation for your answer. If you consider that we should take a different approach, please explain how and the reasons for your view.**

In line with the OfS' recognition that benchmarking may be difficult for some data users to understand (paragraph 170 explicitly states that 'the benchmark values [the OfS] propose to calculate and publish may be challenging for some users to interpret'), some London Higher members have suggested that it may be helpful to receive training on how benchmarks are created (with examples provided) to enable providers to understand and explain them.

While we agree with the factors used in the OfS' proposals for benchmarking, there is a lack of explanation regarding the merging of 'unknown' and 'white'; 'Under 21' and 'unknown'; and 'female' and 'other'. This is extremely confusing and does not seem appropriate without sufficient explanation from the OfS.

We strongly suggest that when benchmarking factors are reviewed after NSS 2023 results have been published, location of provider is assessed as a factor in student positivity measures. While the cost-of-living and housing crises have an impact nationwide, they arguably impact students in London disproportionately.

Many London students do not live on campus and are classed as commuter students and/or live at home while studying. It is likely that the heightened impacts of the cost-of-living crisis and other unavoidable factors of living in London will have an impact on NSS scores given by London students, and it would therefore be appropriate and justified to consider location as a factor in the benchmarking review. It may also be advisable, if this has not already been reviewed by the OfS, to consider if Indices of Multiple Deprivation (IMD) should be included as a benchmarking factor to take account of disadvantage.

**17. Do you agree with our proposed approach for the publication of questions relating to healthcare, allied health and clinical practice placements?**

This would be very valuable information, although it must be stressed that these responses relate to the experience of students in placements rather than within providers, as institutions may have variable levels of control over where their students undertake placements.

**18. Please provide an explanation for your answer. If you consider that we should take a different approach, please explain how and the reasons for your view.**

Institutions may have variable levels of control over where their students go for placements. Therefore, if the results of these questions were published on the OfS or Discover Uni websites, we would strongly suggest that it is made clear that these questions are about positivity in placements rather than providers.

*The remainder of the questions in this consultation will not be answered by London Higher.*